

SCHIFF HARDIN LLP

Donald A. Klein (DK7821)
623 Fifth Avenue
New York, NY 10022
(212) 753-5000

Of Counsel:
John N. Scholnick
Ayad P. Jacob
6600 Sears Tower
Chicago, IL 50505
(312) 258-5500

*Attorneys for Defendants
Schreiber & Zindel Treuhand Anstalt,
Frank O. Zindel, Engelbert Schreiber, Sr.
and Engelbert Schreiber, Jr.*

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

In re Terrorist Attacks on September 11, 2001	03 MDL 1570 (RCC) ECF Case
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This document relates to:

*Estate of O'Neill, et al. v. The Republic of Iraq, et al., Case No. 04 CV 1076 (RCC)
(S.D.N.Y.)*

Estate of O'Neill, et al. v. Al Baraka, et al., Case No. 04 CV 1923 (RCC) (S.D.N.Y.)

NOTICE OF MOTION

PLEASE TAKE NOTICE that, upon the accompanying Declarations of Frank O. Zindel, Engelbert Schreiber, Sr., Engelbert Schreiber, Jr., Guntram Wolf, the Memorandum of Law submitted in support of this motion, and all prior pleadings and proceedings herein, Defendants Schreiber & Zindel Treuhand Anstalt, Frank O. Zindel, Engelbert. Schreiber, Sr., and Engelbert Schreiber, Jr. ("Defendants"), by their attorneys SCHIFF HARDIN LLP, will move this Court at such time as the Court shall determine for an Order pursuant to Rules 12(b)(5) and 12(b)(2) of

the Federal Rules of Civil Procedure, dismissing all claims against each of Defendants in the above referenced actions on the grounds of insufficient service of process and lack of personal jurisdiction, and for such other relief as the Court may deem just and proper.

Dated: May 20, 2005

SCHIFF HARDIN LLP

By:



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